

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

LETICIA FRANCINE STIDHUM,

Plaintiff,

-against-

161-10 HILLSIDE AUTO AVE, LLC d/b/a Hillside
Auto Outlet, HILLSIDE AUTO MALL INC. d/b/a
Hillside Auto Mall, ISHAQUE THANWALLA,
JORY BARON, RONALD M. BARON, and
ANDRIS GUZMAN,

Defendants.

-----X

Andris Guzman declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

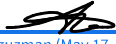
1. I am a Defendant in the above-referenced case who used to be employed by 161-10 Hillside Auto Ave, LLC d/b/a Hillside Auto Outlet (“Hillside Auto Outlet”).
2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge.
3. I have conducted a search of my telephone for all text messages related to the Plaintiff.
4. Other than the text messages I have already produced, I am not in possession, custody, or control of any responsive text messages.
5. I also searched my emails and am not in possession, custody, or control of any responsive emails other than those with my counsel.
6. I do not recall exchanging any emails with the Plaintiff.
7. I did not conduct any search for the weekly sales logs because I am no longer employed by Hillside Auto Outlet.

Case No.: 1:21-cv-7163 (HG) (RLM)

**DECLARATION OF
ANDRIS GUZMAN**

8. I was not employed by Hillside Auto Mall Inc. d/b/a Hillside Auto Mall.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 17, 2023.


andris guzman (May 17, 2023 11:35 EDT)
Andris Guzman







2023-05-17 Guzman Declaration

Final Audit Report

2023-05-17

Created:	2023-05-17
By:	Emanuel Kataev (mail@emanuelkataev.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAybuyaUoRsSZ2oVFPDkqEbjlFadBePh2o

"2023-05-17 Guzman Declaration" History

-  Document created by Emanuel Kataev (mail@emanuelkataev.com)
2023-05-17 - 2:49:44 PM GMT- IP address: 65.51.198.20
-  Document emailed to andris-03@live.com for signature
2023-05-17 - 2:50:04 PM GMT
-  Email viewed by andris-03@live.com
2023-05-17 - 3:33:57 PM GMT- IP address: 151.205.161.176
-  Signer andris-03@live.com entered name at signing as andris guzman
2023-05-17 - 3:35:03 PM GMT- IP address: 151.205.161.176
-  Document e-signed by andris guzman (andris-03@live.com)
Signature Date: 2023-05-17 - 3:35:05 PM GMT - Time Source: server- IP address: 151.205.161.176
-  Agreement completed.
2023-05-17 - 3:35:05 PM GMT